

MEMO ENDORSED

590 Madison Avenue, 20<sup>th</sup> Floor, New York, NY 10022-2524 • p212 223-4000 • f212 223-4134

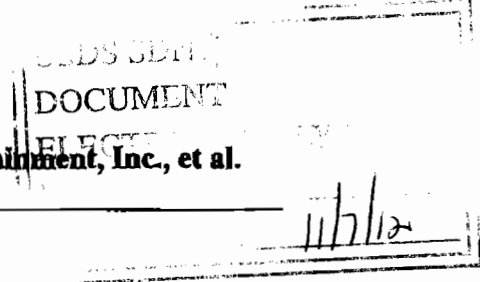
November 7, 2012

11/7/2012  
OK - last 4 days

**VIA FACSIMILE**

Honorable Colleen McMahon  
United States District Judge  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**Re: Medien Patent Verwaltung AG v. Warner Bros. Entertainment, Inc., et al.  
Civil Action No.: 1:10-cv-04119-CM-GWG**



Dear Judge McMahon:

In accordance with the Court's Individual Practices and Procedures, plaintiff Medien Patent Verwaltung AG ("MPV") and defendants Warner Bros. Entertainment, Inc., Technicolor Inc. (collectively "WB/Technicolor"), and Deluxe Entertainment Services Group Inc. ("Deluxe"), write jointly to request a sixty (60) day extension of the deadlines set forth in the revised case schedule endorsed by the Court on October 9, 2012 (Dkt. No. 111).

Plaintiff MPV and defendants WB/Technicolor initially entered into mediation in an effort to resolve their dispute. At the request of defendant Deluxe, the mediation has now expanded to include all parties. MPV and WB/Technicolor are also in the process of engaging a third party to provide an independent opinion on certain aspects of the dispute prior to the next mediation session. This is expected to facilitate resolution of the issues. This extension is requested to accommodate these efforts by the parties to resolve their dispute, including a mediation session scheduled for December 10, 2012 in which all parties will participate.

A second revised Joint Proposed Case Schedule is attached for consideration and approval by the Court. There has been one previous request for a 30-day extension of the original deadlines set forth in the Court's Scheduling Order entered on July 30, 2012 (Dkt. No. 88), which was granted by the Court (Dkt. No. 111).

Respectfully submitted:

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Attachment

***Medien Patent Verwaltung AG v. Warner Bros. Entertainment, Inc., et al.***  
**Case No.: 10-cv-04119-CM-GWG**

**SECOND PROPOSED REVISED CASE SCHEDULE**

<b>Event</b>		<b>Current Schedule</b>	<b>Proposed Revised Schedule</b>
1	Deadline to Amend Pleadings	September 14, 2012	September 14, 2012
2	Deadline to Add Parties	September 14, 2012	September 14, 2012
3	Close of Fact Discovery	December 28, 2012	February 26, 2013
4	Deadline for Parties to serve Opening Expert Reports on issues for which they bear the burden of proof	January 10, 2013	March 11, 2013
5	Deadline for Parties to serve Rebuttal Expert Reports	January 21, 2013	March 22, 2013
6	Close of Expert Discovery	January 30, 2013	April 1, 2013
7	Deadline to file any <i>Daubert</i> motions	February 13, 2013	April 15, 2013
8	Deadline to file any dispositive motions	March 1, 2013	April 30, 2013
9	Joint Pre-Trial Statement due (including action, factual basis for action, disputed legal issues, joint set of jury instructions, exchange of exhibits, deposition designations, etc.)	April 19, 2013	June 18, 2013